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ATTORNEY FOR WILMINGTON TRUST COMPANY

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

**MOTORS LIQUIDATION COMPANY, *et al.*,
f/k/a General Motors Corp., *et al.*,
Debtors.**

Chapter 11

Case No. 09-50026 (REG)

(Jointly Administered)

NOTICE OF APPEARANCE AND REQUEST FOR DOCUMENTS

PLEASE TAKE NOTICE that Gabriel K. Gillett of the law firm of Gibson, Dunn & Crutcher LLP, hereby appears in the above-captioned cases on behalf of Wilmington Trust Company (“WTC”), as trust administrator and trustee for the Motors Liquidation Company GUC Trust. Pursuant to Bankruptcy Rules 2002, 3017 and 9007 and Sections 342 and 1109(b) of the Bankruptcy Code, Counsel requests that his name be added to the mailing list maintained by the Clerk in the above-captioned case, and that all notices given and all papers and pleadings served on any party, filed with the Court or delivered to the Office of the United States Trustee in the above-captioned case be given to and served upon Counsel, at the address set forth below:

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PLEASE TAKE FURTHER NOTICE that this request includes all of the notices and papers referred to in the Bankruptcy Rules, Bankruptcy Code, and Local Bankruptcy Rules, and also includes, without limitation, notices of any orders, pleadings, motions, applications, complaints, or petitions, answering or reply papers, and memoranda and briefs in support of any of the foregoing and any other document brought before this Court with respect to these cases and any proceeding therein, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telecopier, telex or otherwise.

PLEASE TAKE FURTHER NOTICE that WTC intends that neither this Notice of Appearance nor any later appearance, pleading, claim, or suit shall waive: (1) WTC's right to have final orders in noncore matters entered only after de novo review by a District Judge; (2) WTC's right to trial by jury in any proceeding so triable in these cases or any case, controversy, or proceeding related to these cases; (3) WTC's right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (4) any other rights, claims, actions, defenses, setoffs, or recoupments to which WTC is or may be entitled under agreements, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments WTC expressly reserves.

Dated: October 27, 2016

Respectfully submitted,

/s/ Gabriel K. Gillett
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